

Richard L. Wynne, Esq.
Bennett L. Spiegel, Esq.
Lori Sinanyan, Esq. (admitted *pro hac vice*)
JONES DAY
222 East 41st Street
New York, NY 10017
Tel: (212) 326-3939
Fax: (212) 755-7306

- and -

Craig A. Wolfe, Esq.
Malani J. Cademartori, Esq.
Blanka K. Wolfe, Esq.
SHEPPARD MULLIN RICHTER & HAMPTON LLP
30 Rockefeller Plaza
New York, NY 10112
Tel: (212) 653-8700
Fax: (212) 653-8701

Co-Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RELATIVITY FASHION, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 15-11989 (MEW)

(Jointly Administered)

**SECOND AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED
SCHEDULED FOR THE HEARING ON OCTOBER 14, 2015 AT 10:00 A.M. (ET)**

Location of Hearing: The Honorable Michael E. Wiles, Courtroom 617
United States Bankruptcy Court for the Southern
District of New York
One Bowling Green, New York, NY 10004.

¹ The Debtors in these chapter 11 cases are as set forth on page (i).

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Relativity Fashion, LLC (4571); Relativity Holdings LLC (7052); Relativity Media, LLC (0844); Relativity REAL, LLC (1653); RML Distribution Domestic, LLC (6528); RML Distribution International, LLC (6749); RMLDD Financing, LLC (9114); 21 & Over Productions, LLC (7796); 3 Days to Kill Productions, LLC (5747); A Perfect Getaway P.R., LLC (9252); A Perfect Getaway, LLC (3939); Armored Car Productions, LLC (2750); Best of Me Productions, LLC (1490); Black Or White Films, LLC (6718); Blackbird Productions, LLC (8037); Brant Point Productions, LLC (9994); Brick Mansions Acquisitions, LLC (3910); Brilliant Films, LLC (0448); Brothers Productions, LLC (9930); Brothers Servicing, LLC (5849); Catfish Productions, LLC (7728); Cine Productions, LLC (8359); CinePost, LLC (8440); Cisco Beach Media, LLC (8621); Cliff Road Media, LLC (7065); Den of Thieves Films, LLC (3046); Don Jon Acquisitions, LLC (7951); DR Productions, LLC (7803); Einstein Rentals, LLC (5861); English Breakfast Media, LLC (2240); Furnace Films, LLC (3558); Gotti Acquisitions, LLC (6562); Great Point Productions, LLC (5813); Guido Contini Films, LLC (1031); Hooper Farm Music, LLC (3773); Hooper Farm Publishing, LLC (3762); Hummock Pond Properties, LLC (9862); Hunter Killer La Productions, LLC (1939); Hunter Killer Productions, LLC (3130); In The Hat Productions, LLC (3140); J & J Project, LLC (1832); JGAG Acquisitions, LLC (9221); Left Behind Acquisitions, LLC (1367); Long Pond Media, LLC (7197); Madaket Publishing, LLC (9356); Madaket Road Music, LLC (9352); Madvine RM, LLC (0646); Malavita Productions, LLC (8636); MB Productions, LLC (4477); Merchant of Shanghai Productions, LLC (7002); Miacomet Media LLC (7371); Miracle Shot Productions, LLC (0015); Most Wonderful Time Productions, LLC (0426); Movie Productions, LLC (9860); One Life Acquisitions, LLC (9061); Orange Street Media, LLC (3089); Out Of This World Productions, LLC (2322); Paranoia Acquisitions, LLC (8747); Phantom Acquisitions, LLC (6381); Pocomo Productions, LLC (1069); Relative Motion Music, LLC (8016); Relative Velocity Music, LLC (7169); Relativity Development, LLC (5296); Relativity Film Finance II, LLC (9082); Relativity Film Finance III, LLC (8893); Relativity Film Finance, LLC (2127); Relativity Films, LLC (5464); Relativity Foreign, LLC (8993); Relativity India Holdings, LLC (8921); Relativity Jackson, LLC (6116); Relativity Media Distribution, LLC (0264); Relativity Media Films, LLC (1574); Relativity Music Group, LLC (9540); Relativity Production LLC (7891); Relativity Rogue, LLC (3333); Relativity Senator, LLC (9044); Relativity Sky Land Asia Holdings, LLC (9582); Relativity TV, LLC (0227); Reveler Productions, LLC (2191); RML Acquisitions I, LLC (9406); RML Acquisitions II, LLC (9810); RML Acquisitions III, LLC (9116); RML Acquisitions IV, LLC (4997); RML Acquisitions IX, LLC (4410); RML Acquisitions V, LLC (9532); RML Acquisitions VI, LLC (9640); RML Acquisitions VII, LLC (7747); RML Acquisitions VIII, LLC (7459); RML Acquisitions X, LLC (1009); RML Acquisitions XI, LLC (2651); RML Acquisitions XII, LLC (4226); RML Acquisitions XIII, LLC (9614); RML Acquisitions XIV, LLC (1910); RML Acquisitions XV, LLC (5518); RML Bronze Films, LLC (8636); RML Damascus Films, LLC (6024); RML Desert Films, LLC (4564); RML Documentaries, LLC (7991); RML DR Films, LLC (0022); RML Echo Films, LLC (4656); RML Escobar Films LLC (0123); RML Film Development, LLC (3567); RML Films PR, LLC (1662); RML Hector Films, LLC (6054); RML Hillsong Films, LLC (3539); RML IFWT Films, LLC (1255); RML International Assets, LLC (1910); RML Jackson, LLC (1081); RML Kidnap Films, LLC (2708); RML Lazarus Films, LLC (0107); RML Nina Films, LLC (0495); RML November Films, LLC (9701); RML Oculus Films, LLC (2596); RML Our Father Films, LLC (6485); RML Romeo and Juliet Films, LLC (9509); RML Scripture Films, LLC (7845); RML Solace Films, LLC (5125); RML Somnia Films, LLC (7195); RML Timeless Productions, LLC (1996); RML Turkeys Films, LLC (8898); RML Very Good Girls Films, LLC (3685); RML WIB Films, LLC (0102); Rogue Digital, LLC (5578); Rogue Games, LLC (4812); Roguelife LLC (3442); Safe Haven Productions, LLC (6550); Sanctum Films, LLC (7736); Santa Claus Productions, LLC (7398); Smith Point Productions, LLC (9118); Snow White Productions, LLC (3175); Spy Next Door, LLC (3043); Story Development, LLC (0677); Straight Wharf Productions, LLC (5858); Strangers II, LLC (6152); Stretch Armstrong Productions, LLC (0213); Studio Merchandise, LLC (5738); Summer Forever Productions, LLC (9211); The Crow Productions, LLC (6707); Totally Interns, LLC (9980); Tribes of Palos Verdes Production, LLC (6638); Tuckernuck Music, LLC (8713); Tuckernuck Publishing, LLC (3960); Wright Girls Films, LLC (9639); Yuma, Inc. (1669); Zero Point Enterprises, LLC (9558). The location of the Debtors' corporate headquarters is: 9242 Beverly Blvd., Suite 300, Beverly Hills, CA 90210.

I. ~~CONTESTED~~ UNCONTESTED MATTERS:

1. Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief **[Dk. 25]**.

Response Deadline: September 18, 2015 at 4:00 p.m. (Eastern Time) for objections to the Motion; various dates (September 17, 18, 21 and 30, 2015) for objections to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases based on mailing on Contract and Cure Schedule.

Responses Received:

- A. Limited Objection and Reservation of Rights of Select Music LLC to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief, and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief **[Dk. 154]**.
- B. Preliminary Objection to Debtors' Motion to Sell Substantially All of Its Assets **[Dk. 444]**.
- C. Objection of Shoutz, Inc. to Debtors' Proposed Assumption and Assignment of Executory Contracts **[Dk. 449]**.
- D. Limited Objection and Reservation of Rights to Debtors' Sale of Substantially All of the Debtors' Assets to Stalking Horse **[Dk. 457]**.
- E. Reservation of Rights of CIT Bank, N.A., as Administrative Agent **[Dk. 467]**.
- F. Harkins' Objection to Proposed Assumption and Assignment of Executory Contract **[Dk. 469]**.
- G. Objection of Catfish Picture Company, LLC to the Debtors' Notice of (I) Proposed Assumption and Assignment of Executory

Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Costs **[Dk. 471]**.

- H. Limited Objection and Reservation of Rights of Digital Cinema Implementation Partners, LLC and Kasima, LLC to the Debtors' Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale and (II) Associated Cure Costs **[Dk. 472]**.
- I. Objection of Mitchell Grossbach to Debtors' Proposed Assumption and Assignment of Executory Contracts **[Dk. 475]**.
- J. Reservation of Rights of Red Granite Pictures, Inc. to the Debtors' Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale and (II) Associated Cure Costs **[Dk. 484]**.
- K. Objection to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, Etc.; and the Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Costs **[Dk. 485]**.
- L. Reservation of Rights and Limited Objection of Showtime Networks Inc. Regarding Assumption and Assignment of Executory Contracts **[Dk. 487]**.
- M. Objection of PT. Parkit Films to Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Cure Costs **[Dk. 488]**.
- N. Objection of Cinedigm Digital Cinema Corp. to Debtors' Proposed Cure Amounts **[Dk. 489]**.
- O. Reply and Objections of IATM, LLC; Bandito Brothers, LLC; Bandito Films, Inc.; Scott Waugh; Mouse McCoy; Jay Pollak; Jacob Rosenberg; and Bret Anthony Johnston to the Debtors' Contract and Cure Schedule **[Dk. 492]**.
- P. Objection of Kidnap Holdings, LLC to the Proposed Assumption and Assignment of Exclusive License Agreement in Connection with the Sale of Substantially All of the Debtors' Assets **[Dk. 496]**.

- Q. Objection of Relativity Sports, LLC to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Associated Cure Costs **[Dk. 497]**.
- R. Joint Objection of PureBrands, LLC, Bev/Early, LLC and Relativity Education, LLC to Debtors' Notice of Proposed Assumption and Assignment of Executory Contracts and Associated Cure Costs **[Dk. 499]**.
- S. Objection of the Hunter Killer Parties to the Debtors' Sale Motion and Assumption and Assignment of Executory Contracts **[Dk. 500]**.
- T. Objection of Bold Films Productions, LLC to the Proposed Assumption and Assignment of Exclusive License Agreement in Connection with the Sale of Substantially All of the Debtors' Assets **[Dk. 502]**.
- U. Reservation of Rights of RKA Film Financing, LLC to Debtors' Motion for Order Approving the Sale of Substantially All Assets and Granting Related Relief **[Dk. 508]**.
- V. Danone Waters of America, Inc. Objection to Assumption and Assignment of Executory Contract and Cure Amounts and Reservation of Rights **[Dk. 511]**.
- W. Walt Disney Pictures' Limited Response to Proposed Assumption and Assignment and Cure Amount **[Dk. 513]**.
- X. Objections of IATM, LLC; Bandito Brothers, LLC; Bandito Films, Inc.; Scott Waugh; Mouse McCoy; Jay Pollak; Jacob Rosenberg; and Bret Anthony Johnston to Debtors' Motion for an Order Approving the Sale of Substantially All Assets and Granting Related Relief **[Dk. 519]**.
- Y. Objection of PT. Parkit Films to the Sale of Substantially All of the Debtors' Assets **[Dk. 520]**.
- Z. Manchester Securities Corporation and Manchester Library Company LLC's Limited Supplemental Objection to the Debtors' Motion to Sell Substantially All of Its Assets **[Dk. 521]**.
- AA. Limited Objection to Debtors' Motion for Entry of Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interest, and (B) Approving the Assumption and Assignment of Certain

Executory Contracts and Unexpired Leases Related Thereto **[Dk. 524]**.

BB. Protective Objection and Reservation of Rights **[Dk. 528]**.

CC. Reservation of Rights of CIT Bank, N.A., As Agent, to Debtors' Motion for Order Approving the Sale of Substantially All of the Debtors' Assets and Granting Related Relief **[Dk. 530]**.

DD. Limited Objection and Reservation of Rights by CAPS, LLC to Assumption and Assignment of Executory Contract and Cure Amounts and Reservation of Rights **[Dk. 531]**.

EE. Amended Limited Objection and Reservation of Rights by CAPS, LLC to Assumption and Assignment of Executory Contract and Cure Amounts and Reservation of **[Dk. 532]**.

FF. Objection to Debtors' (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale (Master Vendor Agreement Between mOcean LLC and RML Distribution Domestic, LLC) and (II) Associated Cure Costs **[Dk. 545]**.

GG. Objection to Debtors' (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection With Sale (Sponsorship Commitment Agreement Between MPTF Foundation and Relativity Media) and (II) Associated Cure Costs **[Dk. 546]**.

HH. Univision Networks & Studios, Inc. and TeleFutura Network's (I) Limited Objection to Entry of Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief; and (II) Reservations of Rights **[Dk. 556]**.

II. Objection of Verizon Corporate Services Group Inc. to Proposed Cure Amount in Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Costs **[Dk. 559]**.

JJ. Response of LAMF LLC to Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Amounts **[Dk. 564]**.

- KK. Objections of Mica Fund 1, L.P. to Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Amounts [Dk. 565].
- LL. Reservation of Rights of Identical Production Company, LLC Relating to Proposed Assumption and Assignment of Its Contract [Dk. 566].
- MM. Objections of QNO, LLC to Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Amounts [Dk. 567].
- NN. Rondor Music International, Inc.'s Reservation of Rights with Respect to Debtors' Motion for (I) An Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) An Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief and Limited Objection to the Terms of the Proposed Sale [Dk. 568].
- OO. Limited Objection and Reservation of Rights of Home Box Office, Inc. to: (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Costs [Dk. 571].
- PP. Reservation of Rights of Silver Reel Entertainment Mezzanine Fund, L.P. For Itself and on Behalf of Supersensory LLC., to Debtors' Motion for (I) An Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) An Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief [Dk. 572].
- QQ. Objection of Viacom to Proposed Assumption and Assignment of Contracts Between the Debtors and Viacom and Its Affiliates and

Limited Objection to Proposed Sale of Substantially All of the Debtors' Assets [**Dk. 576**].

- RR. Limited Objection and Reservation of Rights of NLP Ventures, LLC in Response to Debtors' Proposed Assumption and Assignment of Executory Contract in Connection with Sale [**Dk. 578**].
- SS. Objection of UniFi Completion Guaranty Insurance Solutions, Inc. as Agent and Attorney-in-Fact for Homeland Insurance Company of New York to Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (II) Associated Cure Amounts [**Dk. 579**].
- TT. Voltage Pictures, LLC's Objection to Debtors' (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale (Exclusive License Agreement Between Voltage Pictures, LLC and Don Jon Acquisition, LLC and RML Domestic Distribution, LLC) and (II) Associated Cure Costs [**Dk. 580**].
- UU. Objection and Reservation of Rights of Edward R. Pressman Film Corporation and ERPFC Releasing, Inc. to Debtors' Proposed Assumption and Assignment of Contract (as Amended) Dated January 16, 2009 [**Dk. 581**].
- VV. Limited Objection of A&E Television Networks, LLC to Debtors' Proposed Assumption and Assignment of Executory Contracts [**Dk. 586**].
- WW. Objection of Brett Ratner and Rat Entertainment, Inc. to Debtors' Motion to Sell Substantially All of Their Assets [**Dk. 590**].
- XX. Objection and Reservation of Rights of Macquarie Investments US Inc. to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief [**Dk. 591**].

- YY. Objection and Request for Adequate Assurance of Discovery Communications, LLC to (I) Proposed Sale and (II) Proposed Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith **[Dk. 592]**.
- ZZ. Objection and Request for Adequate Assurance of Christie Digital Systems USA, Inc. to (I) Proposed Sale and (II) Proposed Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection Therewith **[Dk. 593]**.
- AAA. Objection to Proposed Cure Amount and Reservation of Rights of Scrabble Ventures LLC **[Dk. 594]**.
- BBB. Objection of Netflix to Assumption and Assignment of License Agreements Between the Debtors and Netflix and Limited Objection to Proposed Sale of Substantially All of the Debtors' Assets [FILED UNDER SEAL] **[Dks. 630, 651, & 666]**.
- CCC. Conditional Joinder/Opposition to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief **[Dk. 646]**.
- DDD. Objection and Reservation of Rights of Buck McDonald Productions, LLC to Debtors' Proposed Assumption and Assignment of Contract and to Debtors' Proposed Sale of Substantially All of Their Assets **[Dk. 652]**.
- EEE. Challenge, Objection to Approval of Sale, and Reservation of Rights Re Credit Bid Rights of Senior Lender RKA Film Financing, LLC **[Dk. 662]**.
- FFF. Universal Music Publishing Group's Reservation of Rights and Limited Objection to Proposed Cure Amounts with Respect to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B)

Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief and Limited Objection to the Terms of the Proposed Sale **[Dk. 674]**.

GGG. Objection of EuropaCorp S.A. to the Debtors' Assumption and Assignment of Executory Contracts **[Dk. 689]**.

HHH. Objection of EuropaCorp Films USA, Inc. to Debtors' (I) Sale Motion and (II) Notice of Assignment and Cure **[Dk. 693]**.

III. Limited Objection of Twentieth Century Fox Home Entertainment LLC and FX Networks to the Debtors' (I) Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief and (II) Proposed Assumption and Assignment of Certain Executory Contracts **[Dk. 695]**.

JJJ. Objection and Reservation of Rights of LMB Holdings Limited **[Dk. 696]**.

KKK. Limited Objection and Reservation of Rights of Boy of the Year, Inc. and Many Rivers Productions, Inc., to: Debtors' (A) Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale and (II) Associated Cure Costs, Agreements; and (B) Proposed Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests **[Dk. 700]**.

LLL. Objection and Reservation of Rights of Digital Cinema Implementation Partners LLC and Kasima, LLC to the Debtors' Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale and (II) Associated Cure Costs **[Dk. 703]**.

MMM. Objection to the Debtors' Motion to Sell Substantially All of its Assets **[FILED UNDER SEAL] [Dk. 710]**.

- NNN. Objection Of Scripps Networks, Llc To Debtors' Motion For Approval Of Assumption And Assignment Of Executory Contracts **[Dk. 713]**.
- OOO. Reservation of Rights and Limited Objection of Fintage Collection Account Management B.V. and Its Related and Affiliated Entities, to: Debtors' (A) Notice of (I) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with the Sale and (II) Associated Cure Costs, Agreements; and (B) Proposed Sale of Substantially All of the Debtors' Assets Free and Clear Of Liens, Claims, Encumbrances And Other Interests **[Dk. 718]**.
- PPP. Supplemental Objection of Discovery Communications, LLC to Assumption and Assignment of Certain Executory Contracts **[Dk. 719]**.
- QQQ. Danone Waters of America, Inc. Objection to Assumption and Assignment of Executory Contract and Cure Amounts and Reservation of Rights [Filed Under Seal] **[Dk. 728]**.
- RRR. Memorandum of Law in Support of Debtors Request for an Order Authorizing the Sale of TV Business Assets Free and Clear of Liens, Claims, Interests and Encumbrances **[Dk 737]**.
- SSS. Supplemental Objection of Danone Waters of America, Inc. to Assumption and Assignment of Executory Contract and Cure Amounts and Reservation of Rights **[Dk. 739]**.
- TTT. Objection of RKA Film Financing, LLC To Matters To Be Heard at October 5, 2015 Hearing **[Dk. 748]**.
- UUU. Objections Of IATM, LLC To Third Amended And Restated Asset Purchase Agreement **[Dk. 765]**.
- VVV. Supplemental Limited Objection to Debtors' Motion for Entry of Order (A) Approving the Sale of Substantially all of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, and (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto **[Dk. 765]**.
- WWW. Supplemental Objection and Reservation of Rights of NLP Ventures, LLC in Response to Debtors Proposed Assumption and Assignment of Executory Contract in Connection with Sale **[Dk. 782]**.

Related Documents:

- A. Declaration of Scott Waugh in Support of Reply and Objections of IATM, LLC; Bandito Brothers, LLC; Bandito Films, Inc.; Scott Waugh; Mouse McCoy; Jay Pollak; Jacob Rosenberg; and Bret Anthony Johnston to the Debtors' Contract and Cure Schedule **[Dk. 492]**.
- B. Declaration of Joseph S. Tufaro in Support of Objection of Kidnap Holdings, LLC to the Proposed Assumption and Assignment of Exclusive License Agreement in Connection with the Sale of Substantially All of the Debtors' Assets **[Dk. 498]**.
- C. Declaration of Neal H. Moritz in Support of Objection of the Hunter Killer Parties to the Debtors' Sale Motion and Assumption and Assignment of Executory Contracts **[Dk. 501]**.
- D. Declaration of Gary Walters in Support of Objection of Bold Films Productions, LLC to the Proposed Assumption and Assignment of Exclusive License Agreement in Connection with the Sale of Substantially All of the Debtors' Assets **[Dk. 503]**.
- E. Declaration of Donald Keith in Support of Objection of the Hunter Killer Parties to the Debtors' Sale Motion and Assumption and Assignment of Executory Contracts **[Dk. 504]**.
- F. Declaration of Arne L. Schmidt in Support of Objection of the Hunter Killer Parties to the Debtors' Sale Motion and Assumption and Assignment of Executory Contracts **[Dk. 505]**.
- G. Declaration of George Wallace in Support of Objection of the Hunter Killer Parties to the Debtors' Sale Motion and Assumption and Assignment of Executory Contracts **[Dk. 506]**.
- H. Declaration of Matthew Erramouspe in Support of Manchester Securities Corporation and Manchester Library Company LLC's Limited Supplemental Objection to the Debtors' Motion to Sell Substantially All of Its Assets **[Dk. 522]**.
- I. Manchester Securities Corporation and Manchester Library Company LLC's Motion to File Objection Under Seal **[Dk. 523]**.
- J. Order Granting Manchester Securities Corporation and Manchester Library Company LLC's Motion to File Objection Under Seal **[Dk. 541]**.
- K. Declaration of Thomas Augsberger in Support of Reservation of Rights of Silver Reel Entertainment Mezzanine Fund, L.P. For

Itself and on Behalf of Supersensory LLC., to Debtors' Motion for (I) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors' Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain Related Relief **[Dk. 575]**.

- L. Letter Response **[Dk. 623]**.
- M. Order Authorizing Debtors to File the Manchester Reply Brief, the Baiocco Declaration, the Sharp Declaration, and the Accompanying Exhibits Under Seal **[Dk. 687]**.
- N. Netflix, Inc.'s *Ex Parte* Motion to File Under Seal Portions of the Objection of Netflix to Assumption and Assignment of License Agreements Between the Debtors and Netflix and Limited Objection to Proposed Sale of Substantially All of the Debtors' Assets **[Dk. 632]**.
- O. Order Granting Netflix, Inc.'s *Ex Parte* Motion to File Under Seal Portions of the Objection of Netflix to Assumption and Assignment of License Agreements Between the Debtors and Netflix and Limited Objection to Proposed Sale of Substantially All of the Debtors' Assets **[Dk. 649]**.
- P. Declaration of Robert Roy in Support of Objection of Netflix to Assumption and Assignment of License Agreements Between the Debtors and Netflix and Limited Objection to Proposed Sale of Substantially All of the Debtors' Assets [FILED UNDER SEAL] **[Dk. 667]**.
- Q. Declaration of David Kokakis in Support of Universal Music Publishing Group's Reservation of Rights and Limited Objection to Proposed Cure Amounts with Respect to Debtors Motion for (1) an Order (A) Establishing Bid Procedures for the Sale of Substantially All of the Debtors Assets, (B) Approving Stalking Horse APA and Bidding Protections, and (C) Granting Certain Related Relief and (II) an Order (A) Approving the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Certain

Related Relief and Limited Objection to the Terms of the Proposed Sale **[Dk. 675]**.

- R. Motion of EuropaCorp Films USA, Inc. for an *Ex Parte* Order Authorizing the Filing of an Objection Under Seal **[Dk. 694]**.
- S. Notice of Adjournment of (I) Certain Objections to the Debtors' Sale Motion from October 5 to October 14, 2015 and (II) the Auction of Certain Estate Assets **[Dk. 705]**.
- T. Declaration of Mathew Erramouspe In Support of Manchester Securities Corporation and Manchester Library Company LLC's Limited Supplemental Objection To The Debtors' Motion To Sell Substantially All Of Its Assets [FILED UNDER SEAL] **[Dk. 711]**.
- U. Notice of Adjournment of Hearing Scheduled for October 5, 2015 from 10:00 a.m. to 1:00 p.m. **[Dk. 716]**.
- V. Declaration of Dana Baiocco in Support of Debtors' Omnibus Response in Opposition to Manchester's Objections to the Debtors' Bid and Sale Procedures Motion and in Opposition to Manchester's Objections to the Debtors' DIP Financing Motion [Filed Under Seal] **[Dk. 725]**.
- W. Notice of Successful Bidder for Sale of Substantially All of the Debtors' Television Assets and Proposed Form of Sale Order **[Dk. 732]**.
- X. Supplemental Declaration of Dr. Brian G. Kushner in Support of Debtors' Request for an Order Approving the Sale of TV Business Assets Free and Clear of Liens, Claims, Interests and Encumbrances **[Dk. 735]**.
- Y. Supplemental Declaration of Timothy R. Coleman in Support of Debtors' Request for an Order Approving the Sale of TV Business Assets Free and Clear of Liens, Claims, Interests and Encumbrances **[Dk. 736]**.
- Z. Notice of Filing Sale Order and Redline and Stipulation and Agreed Order And Redline **[Dk. 762]**.
- AA. Revised Notice of Filing Third Amended and Restated Asset Purchase Agreement and Redline **[Dk. 763]**.
- BB. Order (A) Approving the Sale of Substantially All of the Debtors' Television Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (B) Approving the Assumption and Assignment of

Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Dk. 768].

CC. Declaration of Robert Tuschman in Support of Objection of Scripps Networks, LLC to Debtors' Motion for Approval of Assumption and Assignment of Executory Contracts [Dk. 794].

~~Status: This matter is going forward on a contested basis for only the following objecting parties:-~~

- ~~■ Catfish Picture Company, LLC [Dkt. 471];~~
- ~~■ IATM, LLC [Dkt. 492, 519, 764];~~
- ~~■ Scripps Networks, LLC [Dkt. 528, 713];~~
- ~~■ Viacom International [Dkt. 576];~~
- ~~■ NLP Ventures LLC [Dkt. 578];~~
- ~~■ DD. Emergency Motion of A&E Television Networks, LLC [Dkt. 586]; for an Adjournment of the Contract Assumption Hearing [Dk. 817].~~
- ~~■ Ratner and Rat Entertainment, Inc. [Dkt. 590];~~
- ~~■ Discovery Communications, LLC [Dkt. 592, 719]; and~~
- ~~■ Twentieth Century Fox Entertainment LLC [Dkt. 695].~~

Replies:

- A. Omnibus Reply of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Stalking Horse Bidder to Objections Filed with Respect to Assumption and Assignment of Executory Contracts [Dk. 804] [filed under seal].
- B. Declaration of Robert S. Solomon in Support of Omnibus Reply of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Proposed Stalking Horse Bidder to Objections Filed with Respect to Assumption and Assignment of Executory Contracts [Dk. 805].
- C. Debtors' Omnibus Reply to Objections to Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases [Dk. 808] [filed under seal].

Status: This matter is going forward on an uncontested basis. The objections of the following parties are resolved:

- Shoutz, Inc. [Dkt. 449] resolved per agreement to remove the relevant contract from the Contract and Cure Schedule.
- ~~Technicolor, Inc. [Dkt. 524, 765] resolved per the Order entered on October 6, 2015 at Dkt. 768.~~
- CIT Bank, N.A., as agent [Dkt. 467] addressed per language to be added to the Supplemental Order;
- Showtime Networks Inc. [Dkt. 487] resolved per language to be added to the Supplemental Order.
- IATM, LLC [Dkt. 492, 519, 764]; and
- Twentieth Century Fox Entertainment LLC [Dkt. 695].

The objections of the following parties are adjourned to a hearing on October 19, 2015 at 11:00 a.m.:

- Catfish Picture Company, LLC [Dkt. 471];
- Scripps Networks, LLC [Dkt. 528, 713, 794];
- Viacom International [Dkt. 576];
- NLP Ventures LLC [Dkt. 578];
- A&E Television Networks, LLC [Dkt. 586, 817];
- Ratner and Rat Entertainment, Inc. [Dkt. 590]; and
- Discovery Communications, LLC [Dkt. 592, 719].

The balance of the objections are adjourned indefinitely.

2. Debtors' Motion for Entry of Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal of Related Proceedings [Dk. 653].

Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Notice of Hearing of Debtors' Motion for Entry of Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal of Related Proceedings [Dk. 654].

Status: This matter is going forward on an uncontested basis.

3. Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) [Dk. 625].

Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time). Extended by mutual agreement for the Debtors to October 9, 2015 at 4:00 p.m. (Eastern Time).

Responses Received:

- A. Limited Objection of Ryan Kavanaugh [Dk. 637].

Related Documents:

- A. Memorandum of Law in Support of Motion for Relief from Automatic Stay [Dk. 626].
- B. Amended Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) [Dk. 709].

Status: This matter is going forward on an uncontested basis.

4. Debtors' Application Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rule 2014-1 and 2016-1 for Authority to Retain and Employ McGladrey LLP to Provide Certain Tax Advisory Services Nunc Pro Tunc to the Date of the Engagement Letter [Dk. 658].

Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents:

- A. Notice of Hearing on Debtors' Application Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rule 2014-1 and 2016-1 for Authority to Retain and Employ McGladrey LLP to Provide Certain Tax Advisory Services Nunc Pro Tunc to the Date of the Engagement Letter [Dk. 659].

Status: This matter is going forward on an uncontested basis.

5. Debtors' Motion for an Order Authorizing the (I) Rejection of a Nonresidential Real Property Lease, a License and an Automobile Lease and (II) Abandonment of Certain Property of the Estates [Dk. 691].

Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time).

Responses Received: None.

Related Documents: None.

Status: This matter is going forward on an uncontested basis.

III. ADJOURNED MATTERS:

21. Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 409]**.

Response Deadline: September 18, 2015 at 4:00 p.m. (Eastern Time) as extended by mutual agreement.

Responses Received:

- A. Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Proposed Stalking Horse Bidder to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 553]**.
- B. Debtors' Objection, and Joinder with Respect to Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Stalking Horse Bidder, to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral [FILED UNDER SEAL] **[Dk. 554]**.
- C. Debtors' Objection, and Joinder with Respect to Response of Ad Hoc Group of Term Loan Lenders, Dip Lenders, and Stalking Horse Bidder, to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 595]**.
- D. Limited Objection and Reservation of Rights to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively,

Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 604]**.

- E. Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Proposed Stalking Horse Bidder to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 608]**.
- F. Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Proposed Stalking Horse Bidder to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e), or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[FILED UNDER SEAL] [Dk. 629]**.
- G. Limited Joinder and Reservation of Rights of RKA Film Financing, LLC with Respect to Macquarie Investments US Inc.'s (1) Motion (I) for Adequate Protection or, Alternatively, Granting it Relief from the Automatic Stay and (II) to Compel Compliance with the Final DIP Order Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral and (2) Objection and Reservation of Rights to Debtors' Sale Motion **[Dk. 644]**.
- H. Joinder of Official Committee of Unsecured Creditors to the Objection of the Debtors to the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(E) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(D) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(C) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 655]**.
- I. Omnibus Reply of Macquarie Investments US Inc. to Objections Filed with Respect to Motion of Macquarie Investments US Inc. (1) for Adequate Protection Pursuant to U.S.C. §§ 361 and 363(e) or, Alternatively, Granting It Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) ro Compel Compliance with the Final Dip Order and 11 U.S.C. § 362(c)(2) Prohibiting the

Use of Cash Collateral That Constitutes P&A Collateral [Filed Under Seal] **[Dk. 724]**.

- J. Debtors' Omnibus Response in Opposition to Manchester's Objections to the Debtors' Bid and Sale Procedures Motion and In Opposition to Manchester's Objections to the Debtors' DIP Financing Motion **Filed Under Seal** **[Dk. 727]**.

Related Documents:

- A. Declaration of Rushabh Vora in Support of the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 410]**.
- B. Declaration of Mark Mondello in Support of the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 411]**.
- C. Notice of Hearing on the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 412]**.
- D. Macquarie Investments US Inc.'s Ex Parte Motion to File Under Seal (A) Portions of the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief From the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(C)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral and (B) Documents Submitted in Support Thereof **[Dk. 413]**.
- E. Order Authorizing Macquarie Investments US Inc. to File Under Seal (A) the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or,

Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral and (B) Documents Submitted in Support Thereof **[Dk. 426]**.

- F. Joint Stipulation and Order Among the Debtors and Macquarie Investments US Inc. Modifying Sealing Order **[Dk. 466]**.
- G. Ex Parte Motion of Ad Hoc Group of Term Loan Lenders, DIP Lenders and Proposed Stalking Horse Bidder to File Under Seal Their Response to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 552]**.
- H. Debtors' Motion to File Under Seal Debtors' Objection, and Joinder with Respect to Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Stalking Horse Bidder, to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 555]**.
- I. Order Authorizing Filing Under Seal of Response to Motion of Macquarie Investments US Inc. for Adequate Protection or, Alternatively, Granting it Relief from the Automatic Stay and to Compel Compliance with the Final DIP Order and Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 574]**.
- J. Order Granting the Debtors' Motion to File Under Seal the Objection, and Joinder with Respect to Response of Ad Hoc Group of Term Loan Lenders, DIP Lenders, and Proposed Stalking Horse Bidder to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 577]**.
- K. Declaration of David Ahdoot in Support of Limited Objection and Reservation of Rights of the Union Entities to Motion of Macquarie Investments US Inc. (I) for Adequate Protection

Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 605]**.

- L. Omnibus Reply of Macquarie Investments US Inc. to Objections Filed with Respect to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(E) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(D) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(C)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 627]**.
- M. Macquarie Investments US Inc.'s Ex Parte Motion to File Under Seal Portions of the Omnibus Reply of Macquarie Investments US Inc. to Objections Filed with Respect to Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(E) or, Alternatively, Granting it Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(D) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(C)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[Dk. 628]**.
- N. Notice of Adjournment of Hearing Scheduled for October 5, 2015 from 10:00 a.m. to 1:00 p.m. **[Dk. 716]**.
- O. Declaration of Rushabh Vora in Support of the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting It Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[FILED UNDER SEAL] [Dk. 722]**.
- P. Declaration of Mark Mondello in Support of the Motion of Macquarie Investments US Inc. (I) for Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363(e) or, Alternatively, Granting It Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) and (II) to Compel Compliance with the Final DIP Order and 11 U.S.C. § 362(c)(2) Prohibiting the Use of Cash Collateral That Constitutes P&A Collateral **[FILED UNDER SEAL] [Dk. 723]**.

~~**Status: This matter is going forward on a contested basis.**~~

H. UNCONTESTED MATTERS:

- ~~1. Debtors' Motion for Entry of Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal of Related Proceedings [Dk. 653].~~

~~Response Deadline:~~ Status: This matter is adjourned to the hearing on October
719, 2015 at 4:00 p11:00 a.m. (Eastern Time).

~~Responses Received: None.~~

Related Documents:

- A. ~~Notice of Hearing of Debtors' Motion for Entry of Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal of Related Proceedings [Dk. 654].~~

Status: ~~This matter is going forward on an uncontested basis.~~

~~2~~

~~- Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) [Dk. 625].~~

~~Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time). Extended by mutual agreement for the Debtors to October 9, 2015 at 4:00 p.m. (Eastern Time).~~

Responses Received:

- A. ~~Limited Objection of Ryan Kavanaugh [Dk. 637].~~

Related Documents:

- A. ~~Memorandum of Law in Support of Motion for Relief from Automatic Stay [Dk. 626].~~
- B. ~~Amended Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) [Dk. 709].~~

Status: ~~This matter is going forward on a uncontested basis.~~

~~3~~

~~- Debtors' Application Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rule 2014-1 and 2016-1 for Authority to Retain and Employ McGladrey LLP to Provide Certain Tax Advisory Services Nunc Pro Tunc to the Date of the Engagement Letter [Dk. 658].~~

~~Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time).~~

~~Responses Received: None.~~

~~Related Documents:~~

~~A. Notice of Hearing on Debtors' Application Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014 and 2016, and Local Rule 2014-1 and 2016-1 for Authority to Retain and Employ McGladrey LLP to Provide Certain Tax Advisory Services Nunc Pro Tunc to the Date of the Engagement Letter [Dk. 659].~~

~~Status: This matter is going forward on an uncontested basis.~~

4

~~Debtors' Motion for an Order Authorizing the (I) Rejection of a Nonresidential Real Property Lease, a License and an Automobile Lease and (II) Abandonment of Certain Property of the Estates [Dk. 691].~~

~~Response Deadline: October 7, 2015 at 4:00 p.m. (Eastern Time).~~

~~Responses Received: None.~~

~~Related Documents: None.~~

~~Status: This matter is going forward on an uncontested basis.~~

Dated: October 9¹³, 2015
New York, New York

JONES DAY

By: /s/ Lori Sinanyan

Richard L. Wynne, Esq.
Bennett L. Spiegel, Esq.
Lori Sinanyan, Esq. (admitted *pro hac vice*)
222 East 41st Street
New York, NY 10017

Tel: (212) 326-3939
Fax: (212) 755-7306
E-mail: rlwynne@jonesday.com
blspiegel@jonesday.com
lsinanyan@jonesday.com

-and-

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Craig A. Wolfe, Esq.
Malani J. Cademartori, Esq.
Blanka K. Wolfe, Esq.
30 Rockefeller Plaza
New York, New York 10112
Tel: (212) 653-8700
Fax: (212) 653-8701
E-mail: cwolfe@sheppardmullin.com
mcademartori@sheppardmullin.com
bwolfe@sheppardmullin.com

Co-Counsel to the Debtors and Debtors in Possession

Summary report: Litéra® Change-Pro TDC 7.5.0.96 Document comparison done on 10/13/2015 8:56:22 PM	
Style name: JD Color With Moves	
Intelligent Table Comparison: Inactive	
Original DMS: iw://NAI/NAI/1500578274/2	
Modified DMS: iw://NAI/NAI/1500578274/3	
Changes:	
<u>Add</u>	37
Delete	30
Move From	24
<u>Move To</u>	24
<u>Table Insert</u>	2
Table Delete	3
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format Changes	0
Total Changes:	120